UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ERIC YOUNG, ADAM KURTZ, and DAVID CRYSTAL on behalf of themselves and all others similarly situated,

Plaintiffs.

No. 20 Civ. 00169 (KPF) ECF Case

v.

IFINEX INC., BFXNA INC., BFXWW INC., TETHER HOLDINGS LIMITED, TETHER LIMITED, DIGFINEX INC., TETHER OPERATIONS LIMITED, TETHER INTERNATIONAL LIMITED, AND JOHN DOES 1-50,

Defendants.

DAVID LEIBOWITZ, BENJAMIN LEIBOWITZ, JASON LEIBOWITZ, AARON LEIBOWITZ, and PINCHAS GOLDSHTEIN,

Plaintiffs,

v.

IFINEX INC., BFXNA INC., BFXWW INC., TETHER HOLDINGS LIMITED, TETHER OPERATIONS LIMITED, TETHER LIMITED, TETHER INTERNATIONAL LIMITED, DIGFINEX INC., PHILIP G. POTTER, GIANCARLO DEVASINI, LUDOVICUS JAN VAN DER VELDE, REGINALD FOWLER, CRYPTO CAPITAL CORP., and GLOBAL TRADE SOLUTIONS AG,

Defendants.

No. 19 Civ. 09236 (KPF) ECF Case

DECLARATION OF KAREN M. LERNER IN SUPPORT OF MOTION OF PLAINTIFFS ERIC YOUNG, ADAM KURTZ, AND DAVID CRYSTAL TO APPOINT KIRBY MCINERNEY LLP AND THE RADICE LAW FIRM AS INTERIM LEAD COUNSEL

I, KAREN M. LERNER, hereby declare under penalty of perjury pursuant to 28 U.S.C. §

1746, that the following is true and correct:

1. I am a member in good standing of the Bar of the State of New York and am

admitted to practice before this Court.

2. I am a member of the law firm of Kirby McInerney LLP ("Kirby McInerney"),

counsel of record for Plaintiffs in the above-captioned actions ("Plaintiffs"). As such, I have

knowledge of the matters set forth herein. I make this declaration in support of the Motion of

Plaintiffs Eric Young, Adam Kurtz, and David Crystal to Appoint Kirby McInerney and The

Radice Law Firm as Interim Lead Counsel.

3. Attached hereto as Exhibit A is a true and correct copy of the firm resume of Kirby

McInerney LLP.

4. Attached hereto as Exhibit B is a true and correct copy of the firm resume of Radice

Law Firm, P.C.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 13th day of January 2020

at New York, New York.

/s/ Karen M. Lerner

KIRBY McINERNEY LLP

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